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August 19, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

> **Re:** **Ex Parte — Qwest Communications International, Inc.**
> **Consolidated Application for Authority to Provide In-Region, Inter-LATA Services in Montana, Utah, Washington, and Wyoming, WC Docket No. 02-189**

Dear Ms. Dortch:

On Monday, August 5, 2002, the undersigned and Don Petry, representing Hewlett-Packard ("HP"), met by telephone conference with Jon Minkoff of the FCC's Wireline Competition Bureau upon the initiative of Mr. Minkoff. The discussion concerned Mr. Minkoff's question concerning HP's activities during the ROC OSS test with regard to pre-order to order integration and the parsing of pre-order and order information. The discussion included references by HP to HP's sworn testimony before the Colorado Public Utilities Commission, and relevant excerpts are attached as exhibits to a summary of HP's answer.

The attached summary and exhibits are hereby submitted for inclusion in the record for the above-captioned proceeding.

Respectfully submitted,

Geoff May
Hewlett-Packard

Attachments

"Parsing" and Data Integration Performed by HP during the ROC OSS Test

Question:

Please review paragraph 158 of the FCC's Texas Order (*In Re Application by SBC Communications Inc., Southwestern Bell Communications Services, Inc. d/b/a South Western Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas,* CC Docket No. 00-65, Memorandum Opinion and Order, 15 F.C.C.R. 18354 (2000)).

Did HP as the Pseudo-CLEC during the ROC OSS Test build its own "parser" (i.e., as Telcordia apparently did during the Texas evaluation), or did HP utilize parsed information as received from Qwest with regard to its conclusions in Appendix B and C of HP's ROC OSS Final Report regarding the ability of CLECs to successfully integrate preorder and order data?

Answer:

Qwest's IMA EDI implementation differs from the SWBT interface described in paragraph 153 of the FCC's Texas Order.

> *"As an initial matter, we note that our analysis of integration is complicated in this instance by the fact that SWBT has chosen not to provide "parsed" address information at the preordering stage, but instead returns this information to competing LECs in an undifferentiated (or "concatenated") string of alphanumeric characters. [412]"*

Telcordia's functionality testing, as described in paragraph 158, was performed at the request of the Texas Commission and included development of a parsing program. However, HP's Pre-Order/Order integration processes did not have to parse any undifferentiated data as Qwest's IMA EDI interface provides CLECs with Pre-Order, Order and Post-Order information in a "parsed" or "fielded" format. Each individual data element is defined in the Qwest IMA EDI Disclosure documentation with the associated business rules and format characteristics.

As documented in the HP Pre-Order/Order Integration Field Comparison Reports - Analysis of Qwest IMA EDI Releases 7.0 & 8.0, HP developed and implemented the following functionality based upon publicly available Qwest documentation:

- Pre-Order response to Pre-Order query integration for address related data
- Pre-Order response to Order integration for address related data
- Customer Service Record (CSR) to Order integration for Resale POTS & UNE-P POTS

HP successfully developed and implemented integration of the data from an Address Validation Response (AVR) into other transactions. HP's data entry application retained the address information that was returned by Qwest and subsequently used this information to populate address related fields in the following pre-order queries:

- Address Validation Query (AVQ)
- Customer Service Record Query (CSRQ)
- Facility Availability Query (FAQ)
- Service Availability Query (SAQ)
- Telephone Number Availability Query (TNAQ)
- Raw Loop Data Query (RLDQ)
- Meet Point Query (MPQ)

Additionally, HP was able to integrate this address information into the following order related forms:

- Local Service Request (LSR)
- End User (EU)
- Resale Private Line (RPL)
- Directory Listing (DL)

HP also successfully developed and implemented integration of the Services and Equipment data from a Customer Service Record Response (CSRR) onto an order for Resale POTS or UNE-P POTS services. HP's data entry application retained (by telephone number) the service and equipment information that was returned by Qwest and subsequently used this information to populate service detail sections of the Resale form for a Resale POTS or UNE-P POTS order.

This information is documented in Section 5 - P-CLEC Data Integration, pages 38-39 of the HP Pre-Order/Order Integration Field Comparison Report - Analysis of Qwest IMA EDI Release 7.0.

HP provided sworn testimony during a hearing on June 10, 2002 in the matter of the Colorado Public Utilities Commission's Recommendation to the Federal Communications Commission Regarding Qwest Corporation's Provision of In-Region InterLATA Service in Colorado (Docket No. 02H-260T).   During examination, HP testified generally as to its work regarding pre-order to order integration (Exhibit A). HP also provided testimony in response to questions from Mr. Thomas Dixon representing WorldCom about parsing, preorder to order integration by HP during the ROC test, and HP's Pre-order to Order Integration Report for the Arizona Corporation Commission (Exhibit B). Finally, HP testified in response to rebuttal examination from Mr. Andrew Crain of Qwest regarding Mr. Dixon's questions (Exhibit C).

August 6, 2002

HP Ex Parte

Exhibit A

Colorado En Banc Hearing 6/10/02

Transcript Excerpt

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 1           BEFORE THE PUBLIC UTILITIES COMMISSION

 2                OF THE STATE OF COLORADO

 3                Docket No. 02M-260T

 4                    *      *      *

 5   IN THE MATTER OF THE COLORADO PUBLIC UTILITIES

 6   COMMISSION'S RECOMMENDATION TO THE FEDERAL

 7   COMMUNICATIONS COMMISSION REGARDING QWEST

 8   CORPORATION'S PROVISION OF IN-REGION, INTERLATA

 9   SERVICES IN COLORADO.
                                                  2
 1              P R O C E E D I N G S

 2              CHAIRMAN GIFFORD:  Good morning,

 3   everyone.  We'll call Docket 02M-260T.  We are here

 4   this morning for workshops concerning the ROC OSS test

 5   and data reconciliation.

 6              We'll begin the morning by taking

 7   entries of appearance, starting to my left.

 8   Mr. Crain or Ms. Ciccolo?

 9              MS. CICCOLO:  Good morning,

10   Mr. Chairman, Commissioners.  Kris Ciccolo and Andrew

11   Crain appearing on behalf of Qwest.
                                                 84
17                    EXAMINATION

18    BY MR. CRAIN:

19         Q.   On page 9 of what is marked as Exhibit 3,

20   your presentation today, the bottom two highlights or

21   analysis areas included preorder to preorder data

22   integration and preorder to order data integration.

23   Can you explain the actual work you did to build the

24   integrated interface between preorder and order?

25              MR. PETRY:  Yes, Mr. Crain.
```

4

1   HP built an order entry tool that was

2 used during conducting of the test, similar to what a

3 CLEC would do in terms of building both a front end

4 system that allows their customer service

5 representatives to enter and access data as well as

6 provide a gateway to the Qwest OSS.

7   In developing that tool, we did analysis

8 of the Qwest's preorder transactions and the data that

9 was respond -- returned back in those transactions.

10   We also looked at Qwest order

11 transactions and data that was necessary to be

12 populated on those orders that would have a -- a CLEC

13 would obtain that information from the preorder

14 transactions that they did such as an address

15 validation. Once you had validated the address for the

16 service address, that information was used not only for

17 other preorder transactions, but also to then be

18 populated on the order as the service address.

19   HP's IT staff built a technology within

20 our harness to capture that information coming back

21 from the preorder, hold that available to the customer

22 service representative, and allow them to then populate

23 or integrate that in a mechanized fashion into the

24 order as they were moving down to that next step.

25   Q. So the actual interface that HP used

5

1 during the test was integrated to the extent that it

2 took preorder information and automatically populated

3 the order information with that and -- to submit LSRs?

4 　　　　　A.　(MR. PETRY) Yes. And for clarification,

5 the "automatically" is the customer service

6 representative would have had to have selected the

7 appropriate address. This might make -- that they were

8 using for that order.

9 　　　　　Q.　But the customer service representative

10 didn't actually have to retype that information?

11 　　　　　A.　No, they did not have to retype the

12 information. That is correct.

13 　　　　　Q.　Now, you have two reports also mentioned

14 on -- and I apologize --

15 　　　　　MR. MAY: Appendix B, the Qwest reports.

16 　　　　　MR. CRAIN: I'll find the page.

17 BY MR. CRAIN:

18 　　　　　Q.　On page 20 of Exhibit 3, Appendix B and

19 Appendix C; and can you explain the analysis, the field

20 comparison you did in those appendices?

21 　　　　　MR. PETRY: Yes. In doing comparison,

22 the analysis for Appendix B and Appendix C, we took the

23 Qwest documentation, the IMA EDI disclosure

24 documentation, which is the official Qwest

25 documentation for that interface; we compared the Qwest

1 documentation against itself so that if there were --

2 you had a field that was part of an address and it was

3 used in four or five different transactions, we

4 compared across Qwest transactions looking for

5 consistency and format and ability to be integrated.

6   We also compared Qwest documentation

7 against industry publications such as the TCIF,

8 Telecommunications Industry Forum mechanized

9 specifications; and the ASC-X-12, the Accredited

10 Standards Committee X-12 standards documentation. And

11 the results of that analysis are captured in HP's

12 Appendix B and Appendix C of the final report.

13   Q. And what was the ultimate purpose of the

14 preorder integration field comparison report? What was

15 it intended to determine?

16   A. According to the master test plan,

17 Section 12 -- I believe .6, there are several -- three

18 or four references in the master test plan that call

19 for an evaluation of the preorder-order integration.

20 HP conduct the analyses of these documentation to

21 fulfill that as well as the actual implement --

22 developed implementation that we did in our front-end

23 ordering tool to facilitate actual execution of the

24 test.

25   Q. And I don't know if we have the report --

1 final report marked as an exhibit. If we --

2   CHAIRMAN GIFFORD: I know we filed it

3 separately and it's in this record. So I think you can

4 feel free to refer to it.

5   MR. CRAIN: Okay.

6 BY MR. CRAIN:

7   Q.   Then if I look at page 39 of Exhibit B,

8 which is the preorder-order integration field

9 comparison report on 8.0, can you -- is this paragraph

10 the summary of your findings?

11   A.   (MR. PETRY) yes.

12   Q.   Can you read this paragraph, please.

13   A.   (MR. PETRY) reading from HP Appendix B,

14 the preorder/order integration field comparison report

15 analysis of Qwest IMA EDI Release 8.0, page 39: The

16 integration process is highly dependent on the internal

17 application system(s), EDI translator, telecom

18 experience, and integration experience of the CLEC.

19 With that stated, HPC does not feel that there are any

20 issues that would prohibit a CLEC from integrating

21 Qwest data with their internal application system(s).

22 This does not mean that there are not issues that would

23 have to be resolved between Qwest and the CLEC but

24 simply that these issues are not in surmountable."

25   MR. CRAIN: I have no further questions.

August 6, 2002

HP Ex Parte

Exhibit B

Colorado En Banc Hearing 6/10/02

Transcript Excerpt

1   BEFORE THE PUBLIC UTILITIES COMMISSION

2   OF THE STATE OF COLORADO

3   Docket No. 02M-260T

4   *   *   *

5   IN THE MATTER OF THE COLORADO PUBLIC UTILITIES

6   COMMISSION'S RECOMMENDATION TO THE FEDERAL

7   COMMUNICATIONS COMMISSION REGARDING QWEST

8   CORPORATION'S PROVISION OF IN-REGION, INTERLATA

9   SERVICES IN COLORADO.

                                              2

1   P R O C E E D I N G S

2   CHAIRMAN GIFFORD: Good morning,

3   everyone. We'll call Docket 02M-260T. We are here

4   this morning for workshops concerning the ROC OSS test

5   and data reconciliation.

6   We'll begin the morning by taking

7   entries of appearance, starting to my left.

                                              3

17   MR. DIXON: Thomas Dixon appearing on

18   behalf of WorldCom and its regulated subsidiaries.

                  [BY MR. DIXON:]   94

18   Q.   Did HP find that Qwest's documentation

19   was complete for preorder to order integration?

20   A.   (MR. PETRY) Our results are documented in

21   either observations, exceptions, or our reports.

22   Q.   Now, are you familiar with the concept of

23   parsing, p-a-r-s-i-n-g?

24   A.   (MR. PETRY) Yes, I am.

25   Q.   Why don't you describe for the record

                         10

1 what role it might play in the preorder-order

2 integration process if any.

3   A.   (MR. PETRY) Parsing is the term used to

4 describe a process by which you may take a large amount

5 of typically relatively -- or seemingly unstructured

6 data and break it down into component pieces that you

7 can then work with them on a field type of level.

8   Qwest provides in their EDI interface a

9 customer service request, a CSR; the response to that,

10 via EDI, comes back as a parsed CSR, meaning the data

11 comes back broken out so that this is a -- this is the

12 individual field. You may get a universal service

13 order code or USOC that identifies your feature, Call

14 forwarding, Call-waiting; the additional details on

15 that, so it does come back in a parsed format.

16   What Mr. Dixon is referring to is then

17 taking that individual -- those individual data fields

18 and needing to map them into a subsequent order that

19 you are submitting for that customer.

20   HP did do analysis work and development

21 work for CSR taking a parsed CSR response back and

22 mapping it back to a limited number of products and

23 services with Qwest. However we did not use that

24 functionality when conducting the Master Test Plan Test

25 12, due to the test design. We took -- had a different

1 approach, but we did conduct that analysis and that

2 actual development in implementation.

3   Q.   And maybe just to wrap it up in one

4 respect, what is the different approach that HP took?

5   A.   (MR. PETRY) The second approach -- the

6 other approach that HP took, due to the design of the

7 test, was similar to what CLECs would do -- may do, is

8 we created ordering templates based upon a product. If

9 you were ordering a resale plain old telephone service,

10 POTS-type line, we built a template for what that order

11 would like for that type of service. If we were going

12 to be doing Centrex, we had a template that was for a

13 Centrex type of order. And based upon those type of

14 activities, when you were converting or doing a new

15 installation and -- that is the approach we actually

16 used in Test 12.

17   Q.   Did the Pseudo-CLEC use any preorder

18 information provided by KPMG in its sales and marketing

19 role?

20   A.   (MR. PETRY) KP -- no. KPMG submitted the

21 orders over to us, identifying very basic information

22 as to, this is the account, whether it was a telephone

23 number or an address; if it was for, say, new service

24 installation. What the test case was that we had a

25 reference point as to what type of order this would be;

1 and -- but, no, we did not use any preorder information

2 provided by KPMG. We started with an address

3 validation query and pulled all of the related preorder

4 activity necessary to submit an order.

5   Q.   Mr. Crain asked you to refer to a section

6 in the report. I would like to just discuss the report

7 you did in Arizona for minute, if I might -- and by

8 you, I mean your company, not the two of you

9 individually. Are you familiar with the report issued

10 in Arizona that dealt with preorder to order

11 integration? It was identified as Version 4.0 and it

12 was issued on -- actually carries a release date of

13 March 28, 2002.

14   A.   (MR. MAY) We, we are.

15   MR. DIXON: All right, if I may approach

16 the panel.

17   A.   (MR. PETRY) Mr. Dixon, for the record,

18 though, as we stated before, the ROC team was in the

19 involved in the development or the production of that

20 report.

21   So our comments are just based upon a

22 cursory . . .

23   Q.   I presume cursory review of that document

24 is what you wanted to end with.

25   A.   (MR. PETRY) Yes, I was waiting to see

13

1 if --

2   Q.   First of all, just for the record, let me

3 provide you with an electronic version of the document

4 I have before me; it's entitled, Preorder to order

5 integration report for 271 test generator Arizona

6 Corporation Commission; and then I'll refer to the

7 bottom which reflects that it is Final Version 4.0,

8 release date 3/28/02. And it carries the name HP on

9 the cover page. Do you see first what I'm referring

10 to?

11   A.   (MR. PETRY) Yes.

12   A.   (MR. MAY) Yes.

13   Q.   Have you had an opportunity to look at

14 this report at least in some fashion before?

15   A.   (MR. PETRY) Not prior to the Washington

16 hearing.

17   Q.   And the Washington hearing did in fact

18 occur before this hearing.

19   A.   (MR. PETRY) That is correct.

20   Q.   So that might have been your first

21 introduction to this report was in the state of

22 Washington?

23   A.   (MR. PETRY) Correct.

24   Q.   I'm going to ask you to focus for a

25 moment on page 8 of that report.

1   MR. CRAIN: And I guess I would object

2   that -- to the extent we don't have the copy of the

3   report in the record and copies of those -- that report

4   to look at today. I'm going to object to him referring

5   to something on the computer.

6   MR. DIXON: Your Honor, the report

7   contains what appears to be a professional opinion of

8   the company. I want them to it read into the record

9   and ask them if they agree with it. If Qwest wishes to

10 put the report in the record, I have no objection.

11   CHAIRMAN GIFFORD: I'll overrule the

12 objection for now. Why don't you proceed, Mr. Dixon;

13 and if we need to get the full report in the record, we

14 can certainly allow for that.

15   MR. DIXON: Thank you.

16   What I've done is highlight in yellow a

17 paragraph. I would ask either of you to read that out

18 loud into the record slowly and then I'll ask you my

19 last question.?

20   A.   (MR. MAY) Okay reading from that report

21 and the selected paragraph: It is HP's professional

22 opinion based upon its review of Qwest documentation

23 that a CSR to LSC parsing would be a somewhat

24 challenging and complex undertaking for a CLEC with an

25 information technology team that was not experienced in

15

1 EDI development. Other alternatives would be to

2 contract the development of the EDI interface through a

3 service bureau or purchase a third-party solution from

4 a vendor such as Telcordia. There will be a number of

5 issues that will have to be clarified by meetings with

6 Qwest. However a CLEC with the appropriate resources,

7 funding, time, and planning activities can build a CSR

8 to LSR parsing interface.

9   Q.   Do you have any more -- do either of you

10 have any reason to want to look at this report because

11 I have one final question and I'll leave you.

12   A.   (MR. MAY) No.

13   Q.   Thank you.

14   Gentlemen, based on HP's evaluation of

15 preorder to order integration in the ROC test do you

16 agree with the opinion you just read into the record

17 from the Arizona report?

18   A.   (MR. PETRY) We would agree with that

19 paragraph.

August 6, 2002

HP Ex Parte

Exhibit C

Colorado En Banc Hearing 6/10/02

Transcript Excerpt

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 4                  *     *     *

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 9            MS. CICCOLO:  Good morning,

10  Mr. Chairman, Commissioners.  Kris Ciccolo and Andrew

11  Crain appearing on behalf of Qwest.
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20   Q   Regarding integration, Mr. Dixon asked

21 you about the opinion of the test years in Arizona.

22 Building an EDI interface is a fairly complex task;

23 isn't that correct?

24   A   (by Mr. Petry) Yes.

25   Q   It's something that you wouldn't

 1 expect someone like me without experience to wake

 2 up one morning and say, I think I'll build an EDI

 3 interface today but you would expect someone with

 4 some experience to be doing that?

 5   A   That is correct. If you want it to be

 6 successful.

 7   Q   I believe Mr. Dixon read the

 8 opinion of the Arizona HP team and it stated, and I'm

 9 paraphrasing because I don't have it in front of me,

10 that HP finds that a CLEC with the appropriate

11 experience can build an integrated interface using

12 Qwest part CSR. Is that essentially your opinion

13 as well?

14   A   That was, I believe, the concluding

15 statement of that paragraph.

16   Q   You agreed with that?

17   A   Yes, I did.